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1 2 3 4 5 6	KELLIE M. MURPHY, ESQ. (SBN 189500) MARIA E. MINNEY, ESQ. (SBN 289131) JOHNSON SCHACHTER & LEWIS A Professional Law Corporation Point West Commerce Centre 1545 River Park Drive, Suite 204 Sacramento, CA 95815 Telephone: (916) 921-5800 Facsimile: (916) 921-0247 E-mail: kellie@jsl-law.com / maria@jsl-law.com Attorneys for DEFENDANTS: HUMANITY FOR HORSES and CARLOS RU	
8	UNITED STATES DISTRICT COURT	
9	FOR THE EASTERN DISTRICT OF CALIFORNIA	
10	SACRAMENTO DIVISION	
11	JERRY FUENTES, an Individual,	CASE NO. 2:21-CV-02350-JAM-AC
12 13	Plaintiff,	STIPULATION AND ORDER RE: FURTHER EXTENSION OF TIME FOR DEFENDANTS TO FILE RESPONSIVE
14	v.	PLEADING
15	HUMANITY FOR HORSES, a California Non-Profit Corporation; CLAUDIO RUBIO, an Individual, and DOES 1 through 10,	Superior Cmplt. Filed: November 5, 2021 Removed: December 17, 2021
16		
17	inclusive,	Trial Date: None Set
18	Defendants.))
19		
20	IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JERRY	
21	FUENTES ("Plaintiff") and Defendants HUMANITY FOR HORSES and CARLOS RUBIO	
22	("Defendants"), by and through their attorneys of record, and pursuant to Local Rules 137, 143,	
23	and 144, that Defendants should be granted an additional extension of time to file their	
24	responsive pleadings to Plaintiff's Complaint to April 4, 2022. The parties further stipulate that	

an amended complaint is filed before that date, Defendants should have twenty-one (21) days to file their responsive pleadings to that amended complaint.

The responsive pleading deadline was previously extended twice by stipulation, to allow additional time for service of individual defendant Claudio Rubio (Dkt. 4) and, after Rubio was

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Case 2:21-cv-02350-JAM-AC Document 10 Filed 03/14/22 Page 2 of 3

served, so that responsive pleadings for all defendants would be due on the same date and to
allow additional time for discussion between the parties regarding further handling of the matter
(Dkt. 6).

The parties have since met and conferred on issues Defendants intend to raise in a motion to dismiss, and Plaintiff has indicated an intent to file an amended complaint to attempt to address those issues. The parties therefore believe and respectfully submit that good cause exists to extend the responsive pleading deadline to allow time for the filing of the amended complaint and, if an amended complaint is filed, to allow Defendants twenty-one (21) days to file their responsive pleadings so that further meet and confer efforts can be undertaken, if necessary.

IT IS SO STIPULATED AND REQUESTED.

Dated: March 11, 2022	A Professional Law Corporation
	By: <u>/s/ Kellie M. Murphy</u> KELLIE M. MURPHY MARIA E. MINNEY Attorneys for Defendant
Dated: March 11, 2022	HUMANITY FOR HORSES WEST COAST EMPLOYMENT LAWYERS, APLC
	By:/s/ Crystal F. Mohsin (as auth. on 03/11/2022)

By:/s/ Crystal F. Mohsin (as auth. on 03/11/2022)

NEAMA RAHMANI

RONALD L. ZAMBRANO

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Attorneys for Plaintiff

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Case 2:21-cv-02350-JAM-AC Document 10 Filed 03/14/22 Page 3 of 3

Pursuant to the stipulation of the parties, and finding good cause, IT IS HEREBY ORDERED that Defendants' deadline to file pleadings responsive to the complaint shall be extended to and including **April 4, 2022**. IT IS HEREBY FURTHER ORDERED that if Plaintiff files an amended complaint prior to that deadline, Defendants shall have twenty-one (21) days from the date of such filing to file their responsive pleadings.

IT IS SO ORDERED.

Dated: March 14, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ UNITED STATES DISTRICT COURT JUDGE